

From: [Frank, Nathan](#)
To: kent.mohr@illinois.gov; [Keppner-Bauman, Yasmine](#)
Subject: FW: Meyer Summary
Date: Wednesday, July 24, 2019 4:15:00 PM
Attachments: [Meyer Steel Drum Inc NOV-FOV.pdf](#)

Hi Kent and Yasmine,

As I mentioned, here's our summary of the Meyer Steel Drum matter. Let me know if you have additional questions or concerns.

Thanks!!!

From: Letuchy, Alexandra
Sent: Wednesday, July 24, 2019 4:03 PM
To: Frank, Nathan <frank.nathan@epa.gov>
Cc: Patel, Manojkumar <patel.manojkumar@epa.gov>; Carlson, Deborah <carlson.deboraha@epa.gov>
Subject: Meyer Summary

Meyer receives steel drums that contain residual oils, solvents, and other industrial liquids when they arrive onsite. The drums are cleaned to remove residue either in drum furnaces or by caustic wash. The caustic wash consists of five interior wash lines which are normally operated concurrently. Three interior wash lines are normally used to wash drums that previously contained oil ("oil wash lines"). Two interior wash lines are normally used to wash drums that previously contained solvent ("solvent wash lines"). After the interior wash line, the drums proceed to the exterior washer. Finally, the interior of the drums is washed again in the flusher. Emissions from the wash lines are captured using collection points in the floor and are routed through a caustic scrubber and as of December 15, 2017, exhausted to the atmosphere. Emissions from the flusher exhaust through east and west outlet ducts.

On December 15, 2017, EPA conducted an inspection of the Facility.

On March 30, 2018, EPA issued an information request to the Facility, requiring, among other things, that Meyer conduct performance testing to measure VOC emissions exhausted at the drum interior and exterior washing operations and the flusher.

On March 7 – 8, 2019, Meyer conducted performance testing at the scrubber outlet and at the east and west outlet ducts. EPA witnessed the performance test.

On June 28, 2019, EPA issued a Notice and Finding of Violation to Meyer for, among other things, exceeding the 8 lb/hr organic materials limit at the solvent wash lines, in violation of 35 Ill Adm. Code 215.301 and for failing to capture and control emissions from the solvent wash lines and the flusher to achieve 81% reduction, in violation of 35 Ill. Admi Code 218.986(a). Attached is a copy of the NOV-FOV.

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